Case: 4:24-cv-01304-HEA Doc. #: 24-10 Filed: 11/08/24 Page: 1 of 8 PageID #:

# Exhibit 7 Emails with Insurer

Charles.

The rates we agreed upon yesterday are approved:

Your hourly rate: \$575 Associates: \$380 Paralegals: \$175

I'll be working on the travel time issue. Meanwhile, you and Joe will be working on setting up a system to submit your bills electronically to Legal Solutions Suites. I'll inquire about that on my end also, but I do not foresee any issues.

### Annamarie

Annamarie D. Haught, J.D.
Senior Claim Consultant
Intact Insurance Specialty Solutions
199 Scott Swamp Road
Farmington, CT 06032
T. 860-321-2753
W. intactspecialty.com/
ahaught@intactinsurance.com

From: Haught, Annamarie D. <ahaught@intactinsurance.com>

**Sent:** Monday, January 08, 2024 7:31 AM

To: charles@bundrenlaw.net

**Cc:** midwestjim@charter.net; jimhoft@gmail.com; jwhoft@gmail.com; John C. Burns

<john@burns-law-firm.com>

**Subject:** RE: [E!] - RE: secure email FW: Ruby Freeman and Wandrea Moss, Plaintiffs v. James Hoft, Joseph Hoft, and TGP Communications LLC d/b/a THE GATEWAY PUNDIT, 0AB349402

Mr. Bundren,

As I stated in my earlier email of today, here is the email I thought I sent on 1/2/24.

We have reviewed the proposed retainer agreement. As we advised Mr. Burns, we preliminarily approved the insureds' retention of your firm subject to approval of hourly rates and an agreement to submit bills electronically to Legal Solutions Suites (see attached LSS instruction letter) and abide by the attached Outside Case Handling Guidelines. As an initial matter, the insureds will be retaining your firm and Intact does not sign retainer agreements. As for the proposed hourly rates, Intact pays normal and customary rates for this type of litigation. We are mindful this is a declining balance policy and propose that we pay your firm the same rates as current defense counsel, Randazza Legal Group, PLLC. Those rates are: \$450 for partners, \$380 for associates, and \$175 for paralegals.

Finally, the retainer agreement conflicts with the attached Guidelines; to the extent that such a conflict exists, the Guidelines will prevail in this case.

I look forward to hearing from you.

Annamarie D. Haught, J.D.
Senior Claim Consultant
Intact Insurance Specialty Solutions
199 Scott Swamp Road
Farmington, CT 06032
T. 860-321-2753
W. intactspecialty.com/
ahaught@intactinsurance.com

From: <a href="mailto:charles@bundrenlaw.net">charles@bundrenlaw.net</a>>

Sent: Friday, December 22, 2023 4:07 PM

**To:** Haught, Annamarie D. <a href="mailto:ahaught@intactinsurance.com">ahaught@intactinsurance.com</a>

Cc: midwestjim@charter.net; jimhoft@gmail.com; jwhoft@gmail.com;

charles@bundrenlaw.net

Subject: [E!] - RE: secure email FW: Ruby Freeman and Wandrea Moss, Plaintiffs v. James

Hoft, Joseph Hoft, and TGP Communications LLC d/b/a THE GATEWAY PUNDIT,

0AB349402

[E!] Warning! This email originated outside of our organization.

[E!] Attention! Ce courriel provient de l'extérieur de notre organisation.

Thank you.

**From:** Haught, Annamarie D.

**Sent:** Fri, 22 Dec 2023 20:02:17 +0000

To: William Charles Bundren

Cc: Jim Hoft, Jim Hoft, Joe and Jim Hoft GATEWAY PUNDIT

**Subject:** secure email FW: Ruby Freeman and Wandrea Moss, Plaintiffs v. James Hoft, Joseph Hoft, and TGP Communications LLC d/b/a THE GATEWAY PUNDIT, 0AB349402

Mr. Bundren,

Thank you for the email and the proposed retainer agreement. We will review and get back to you.

-----

Annamarie D. Haught, J.D.

Senior Claim Consultant

Intact Insurance Specialty Solutions 199 Scott Swamp Road

Farmington, CT 06032

T. 860-321-2753

W. intactspecialty.com/

ahaught@intactinsurance.com

From: William Charles Bundren <charles@bundrenlaw.net>

Sent: Thursday, December 21, 2023 8:16 PM

**To:** Haught, Annamarie D. <a href="mailto:ahaught@intactinsurance.com">ahaught@intactinsurance.com</a>; Jim Hoft

<midwestjim@charter.net>; Jim Hoft <jimhoft@gmail.com>; Joe and Jim Hoft GATEWAY

PUNDIT <jwhoft@gmail.com>

**Subject:** [E!] - ATTORNEY-CLIENT PRIVILEGED AND CONFIDENTIAL WORK PRODUCT MENTAL IMPRESSION COMMUNICATION. Re: Ruby Freeman and Wandrea Moss, Plaintiffs v. James Hoft, Joseph Hoft, and TGP Communications LLC d/b/a THE GATEWAY PUNDIT, Defendant. Case No. 2122-CC-...

[E!] Warning! This email originated outside of our organization.

[E!] Attention! Ce courriel provient de l'extérieur de notre organisation.

Annamarie D. Haught, J.D.

Senior Claim Consultant

## INTACT INSURANCE SPECIALTY SOLUTIONS

199 Scott Swamp Road

Farmington, CT 06032

Phone: (806) 321-2753

Email: <u>ahaught@intactinsurance.com</u>

Jim Hoft

Email: <u>midwestjim@charter.net</u>

jimhoft@gamil.com

Joe Hoft

Email: <u>jwhoft@gmail.com</u>

Re: Ruby Freeman and Wandrea Moss, Plaintiffs v. James Hoft, Joseph Hoft, and TGP Communications LLC d/b/a THE GATEWAY PUNDIT, Defendant. Case No. 2122-CC-09815-01, IN THE CIRCUIT COURT OF ST. LOUIS CITY, MISSOURI TWENTY-SECOND JUDICIAL CIRCUIT.

Re: Insurance Policy Number: MEP-25081-21

Renewal of: MEP -23005-20

Insurer: ONE BEACON PROFESSIONAL

INSURANCE,

6800 College Blvd., Suite 350, Overland

Park, KS 66211.

Underwriter: Atlantic Specialty Insurance Company

("Underwriter"), 150 Royall Street,

Canton, MA 02021

Insurance policy description: Media Advantage Policy

Named Insured: TGP Communications, LLC, 5105 Lindell

Boulevard, St. Louis, MO 63108.

Account No. 199908

Dear Jim, Joe, and Annamarie:

Attached please find an executed copy of BUNDREN LAW GROUP, PLLC'S retainer agreement with respect to Bundren Law representation of Defendants in the above referenced Litigation and payment of attorney's fees and expenses by the Insurer.

If the agreement meets with your approval, please execute the agreement, and return it to my attention by email.

Annamarie, are you authorized to sign the retainer agreement on behalf of the insurer? If not, please advise me of the person who will be signing the retention agreement for the insurer, and their title.

Thank you.

Wm. Charles Bundren, Esq.

Texas State Bar No. 03343200

# **BUNDREN LAW GROUP, PLLC**

2591 Dallas Parkway, Suite 300

Frisco, Texas 75034

Telephone: 214.808.3555

Fax: 972.624.5340

Cell: 214.808.3555

e-mail: charles@bundrenlaw.net

John 3:16

Ps. 78

### STATEMENT OF CONFIDENTIALITY

The information contained in this electronic communication and any attachment to this message are

intended for the exclusive use of the addressee(s) and may contain confidential or privileged

information. If you are not the intended recipient please notify Wm. Charles Bundren, Esq. at

214.808.3555, and destroy all copies of this message and any attachments, IRS Circular 230

disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any

U.S federal tax advice contained in this communication (including any attachments) not intended or

written to be used, and cannot be used, for the purposes of (i) avoiding penalties under the Internal

Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or

matter addressed herein.